



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101  
October 31, 1994

Reply to  
Attn of: HW-113

Paul Fuglevand  
Dalton, Olmsted & Fuglevand  
19017 120th Ave. NE, Suite 107  
Bothell, Washington 98011

RE: Review of draft Summary of Existing Information, Appendix C; Hylebos Waterway, Commencement Bay Nearshore/Tideflats Superfund Site

Dear Mr. Fuglevand:

With this letter, I am providing comments from U. S. Environmental Protection Agency (EPA), Washington Department of Ecology, and our contractor, R. F. Weston's review of Appendix C of the Hylebos Cleanup Committee's (HCC) September 19, 1994 draft Summary of Existing Information report.

As noted in EPA's October 27, 1994 letter, computation of time for responding to comments will start with the HCC's receipt of this letter. The schedule for providing a revised report responding to EPA's comments is hereby extended to 60 days from receipt of this letter.

Please feel free to call me at 553-2140, if you have any questions. I will be out of the office from November 7, 1994 until December 12, 1994. If you have any questions during this time you can contact Lori Cohen at 553-6253 regarding technical issues or Lori Houck at 553-1115 regarding legal issues.

Sincerely,

Allison L. Hiltner  
Remedial Project Manager

Enclosures

cc: Bob Taylor, NOAA  
Jeff Krausmann, USFWS



**REVIEW OF APPENDIX C OF THE SUMMARY OF EXISTING INFORMATION  
DRAFT REPORT FOR THE COMMENCEMENT BAY NEARSHORE/TIDEFLATS  
SUPERFUND SITE - HYLEBOS WATERWAY PRE-REMEDIAL DESIGN**

1. **Global:** Neither EPA nor other reviewers were able to check 100% of the information in Appendix C (nor in the rest of the report) against source documents for accuracy. EPA reserves the right to bring up discrepancies between this summary report and source documents to the HCC for resolution if discovered in the future.
2. **Global:** When referring to Ecology conclusions in their Milestone reports, the report should clarify that Ecology has determined that a facility is (or is not) an ongoing source of problem chemicals to the Waterway. Ecology reports do not address historical contamination. The Ecology determination in the Milestone 1 reports as to whether or not the facility is an ongoing source should be listed for each facility. Currently, this information is provided for some facilities but not others. Also, the report should note that Ecology has not done extensive inspections of many of the properties which drain to Hylebos Creek and Fife Ditch, because they have determined that Hylebos Creek and Fife Ditch themselves are not an ongoing source of problem chemicals to the Hylebos.
3. **Global:** Several inconsistencies were found between the PRC report and the HCC's report. Where the HCC has changed or updated information from the PRC report, EPA should be provided with the appropriate reference so the accuracy of the new information can be verified.
4. **Page C-1:** See comments to page 1 of the main text regarding the disclaimer. See also comments to page 2 regarding citing the PRC report. In the third paragraph, the reference to Figure 5-1 should be 5-2. With regard to the last sentence on this page: any corrections the Port of Tacoma wishes to make should be included in the revised version of the report, and appropriate references should be provided to EPA.
5. **Page C-3, 401 Alexander Ave. (#1):** The text states that Table B-1 lists tenants who leased property in areas which drained to Hylebos, however only AK-WA is listed in Table B-1.
6. **Page C-4, 401 Alexander Ave. (#1), Tacoma Boatbuilding:** Ecology staff note that sandblast grit is present on parts of the old Tacoma Boatbuilding site, but that it was located in a portion of the property that does not drain to the Hylebos Waterway.  
  
**Todd Shipyard/U. S. Navy:** The report indicates that U. S. Navy and Todd Shipyard formerly owned the 401 Alexander property. Please provide documentation of their ownership.

7. **Page C-5, 605 Alexander Ave. (#2):** In potential pathways, suggest adding bank erosion. Also, it is stated in the summary of available information that in July 1981, Ecology detected high levels of several metals and organics near "the outfall"; is information available regarding which outfall?
8. **Page C-8, 709 Alexander Ave. (#3):** Hart Crowser (1994) and Kohredar (sic) et al. (1994) reported the presence of sludge material mixed with anodes in "the berm" on the property; is it known if this is in reference to the shoreline bank, or a separate location? Please correct spelling of "Kohredar", it should be Kourehdar. Also, please note that Ecology is working with PRI to develop a plan to clean up sludge and graphite anodes on the banks.
9. **Page C-9, 721-1/2 Alexander Ave. (#4):** It is stated in the summary of available information that in 1992, sampling revealed that metals had been released via groundwater seepage from the bank directly below "the outfall"; please clarify which outfall, if known. Also, Ecology staff notes that seeps were not sampled but the outfall had elevated metals, possibly due to first flush runoff from the parking lot. Also, please note that Linden Trucking no longer operates at this location.
10. **Page C-11, 3529 - 33 East 11th St. and 1100 Alexander Ave. (#6):** There is a typographical error in the table - Crop. should be Corp.
11. **Page C-12, 3302 East 11th St. (#7):** Ecology staff notes that it is possible that large rainstorm events may result in overland flow that could drain to the ditch and then to the Hylebos.
12. **Page C-14, 1123 Taylor Way (#8-A):** Did the UBAT inspection report indicate that there was evidence of releases of thinner and waste oils? Please clarify.
13. **Page C-16, 1202 Taylor Way (#9):** The summary of available information should note that Ecology determined that this facility was not an ongoing source of problem chemicals to the Hylebos. Also, please provide a reference for tenancy of Lewis and Clark Railroad on the property.
14. **Page C-20, 1629 Alexander Ave. (#10-B):** The summary of available information implies that information is available that shows past drainage is to Blair Waterway. However, the Ecology document cited only addresses current drainage. If the HCC has information on historical drainage, it should be cited. Also, please provide a reference for Chemical Processors/Burlington Environmental's ownership of property.
15. **Page C-25, 2000 Taylor Way (#14):** The summary of available information should specify that the samples collected by Ecology in 1992 were sediment samples collected from catch basins and manholes.

16. **Page C-27, 1707 Alexander Ave. (#15):** The summary of available information should specify that the fill material removed from the site was Asarco slag.
17. **Page C-33, 1515-1601 Taylor Way (#17):** If possible, please specify the general location(s) of the sediment samples collected as part of the Kennedy/Jenks (1994) investigation, i.e., were the samples collected from the swale, other drainages, or the waterway? Also, several more tenants are listed here than in the PRC report. Please provide references for the new information.
18. **Page C-34, 1515-1601 Taylor Way (#17):** Is it possible to specify the nature of the "surface water" samples described on this page, i.e., were the samples collected from on-site drainages?
19. **Page C-35, 1621 Taylor Way (#18):** Page C-35 indicated that there are no identified chemicals associated with this property; however, the Problem Area Status Report (PRC 1993) indicated that organics (e.g., xylene and acetone) are associated with site manufacturing processes.
20. **Pages C-40 and C-41, Taylor Way and 49th St. and 2160 Taylor Way on 49th St.:** Please check if the references to 49th St. are correct.
21. **Page C-45, Lincoln and Hylebos (#22-B):** Please correct this entry per Murray Pacific's July 7, 1994 letter to Ronald Wills of Hartman Assoc.
22. **Page C-47, 2340 Taylor Way (#23-B):** Ecology staff note that there is now a building on this property.
23. **Page C-48, 2301 Taylor Way (#24):** The summary of available information indicates that a bank composite sample collected in 1992 had "slightly high levels" of arsenic and zinc; did the source document for this investigation indicate if the concentrations exceeded SQOs? It is also stated that 2 of 8 surface soil samples had "elevated" arsenic; did the source document indicate if the arsenic concentrations exceeded MTCA levels? Also, it would be helpful if the map could be updated to reflect the fact that Murray Pacific has purchased a portion of the USG property (see attached drawing).
24. **Page C-52, 3009 Taylor Way (#26):** The list of potential pathways to Hylebos Waterway should include runoff via East Channel Ditch.
25. **Page C-53, 3009 Taylor Way (#26):** Delete the last sentence on this page. Ecology has not yet "delisted" any sites on the Hylebos. The reference noted is not in the list of references.
26. **Page C-54, 3003 Taylor Way (#27):** If possible, please indicate if the "ditch

samples" collected by Ecology in 1990 were samples of surface water, sediment, or both.

27. **Pages C-55 and C-56, 3002 Taylor Way (#28):** In the second sentence in the summary of available information, "contact cooling water" should be "non-contact cooling water". (This was a mistake in the PRC report - see SiMetCo's 1992 response to EPA's information request.)
28. **Page C-58, 3400 Taylor Way (#30):** EPA has no information that the Department of Defense or Oline Corp. were previous owners or operators on this property. Please provide supporting documentation.
29. **Page C-62, 3601 Taylor Way (#32):** Please provide a reference for Tucci and Sons, listed as a current tenant.
30. **Page C-68, 1650 Marine View Drive (#38):** Please provide a reference for the owners and tenants listed for this property, other than Streich Brothers.
31. **Page C-69, 1635 Marine View Drive (#39):** The summary of available information refers to water and sediment samples collected in 1992; is information available from the source document indicating the location(s) at which samples were collected (i.e., were samples collected from on-site drainage ditches or Hylebos Creek)?
32. **Page C-70, 1670 Marine View Dr. (#40):** Please specify the general locations of the "marine samples" (i.e., were these the samples collected offshore of the ditch outfalls, as described in the PRC Report?).
33. **Page C-71, 1690 Marine View Drive (#41):** It is stated in the summary of available information that the grit behind the bulkhead was cleaned up. Was any information available regarding post-cleanup confirmatory sampling, i.e., was any conducted to verify that all grit had been removed?
34. **Page C-72, 1720-1750 Marine View Dr. (#42):** Did the Gooding (1991) investigation report indicate which outfall is considered the "main outfall" at Manke?
35. **Page C-76, 1751 Marine View Dr. (#44):** Ecology staff note that the truck wash drains to the sanitary sewer, but that stormwater probably goes to the Hylebos.
36. **Page C-77, 1902 Marine View Dr. (#45):** Is information available regarding the general locations of the 1988-1989 surface water samples (i.e., were samples collected from drainages or the waterway)?

37. **Page C-79, 1803-1883 Marine View Dr. (#46):** EPA's information indicates that General Metals is a tenant on this property. Please let us know if our information is incorrect.
38. **Page C-87, 2120 Marine View Dr. (#51):** Please provide reference for former tenancy by Knapp Boatbuilding Co.
39. **Page C-88, 2218 Marine View Dr. (#52):** Results of several "samples" are provided in the summary of available information, but the media sampled are not identified. This information should be included if available. Ecology staff notes that some evidence of autofluff was observed in the intertidal zone, but quantities behind the bulkhead are unknown.
40. **Page C-89, 2408 Marine View Drive. (#52-A):** The list of owners and tenants is different than that presented in the PRC report. Please correct or provide references for new information.
41. **Page C-97, 4102-4106 East 11 St. (#60, 61):** The PRC report lists Pacific Marine Repair as a tenant on this property. Why was this company not included in this entry?
42. **Page C-98, 4124 East 11th St. (#61-A):** It is stated in the last sentence of the summary of available information that the two catch basins on the property have been "tested." Did the source document indicate what type of testing was conducted, i.e., were confirmatory sediment samples of the catch basins collected and analyzed?
43. **Page C-103, 2930 Marine View Dr. (#64-A):** The report should note that Ken's also received a conditional release of liability from EPA.
44. **Page C-114, 1621 Marine View Dr. (#72):** Ecology did a follow-up inspection on this property and took some samples. Sample results are provided in the attached letter. This information should be added to the report.

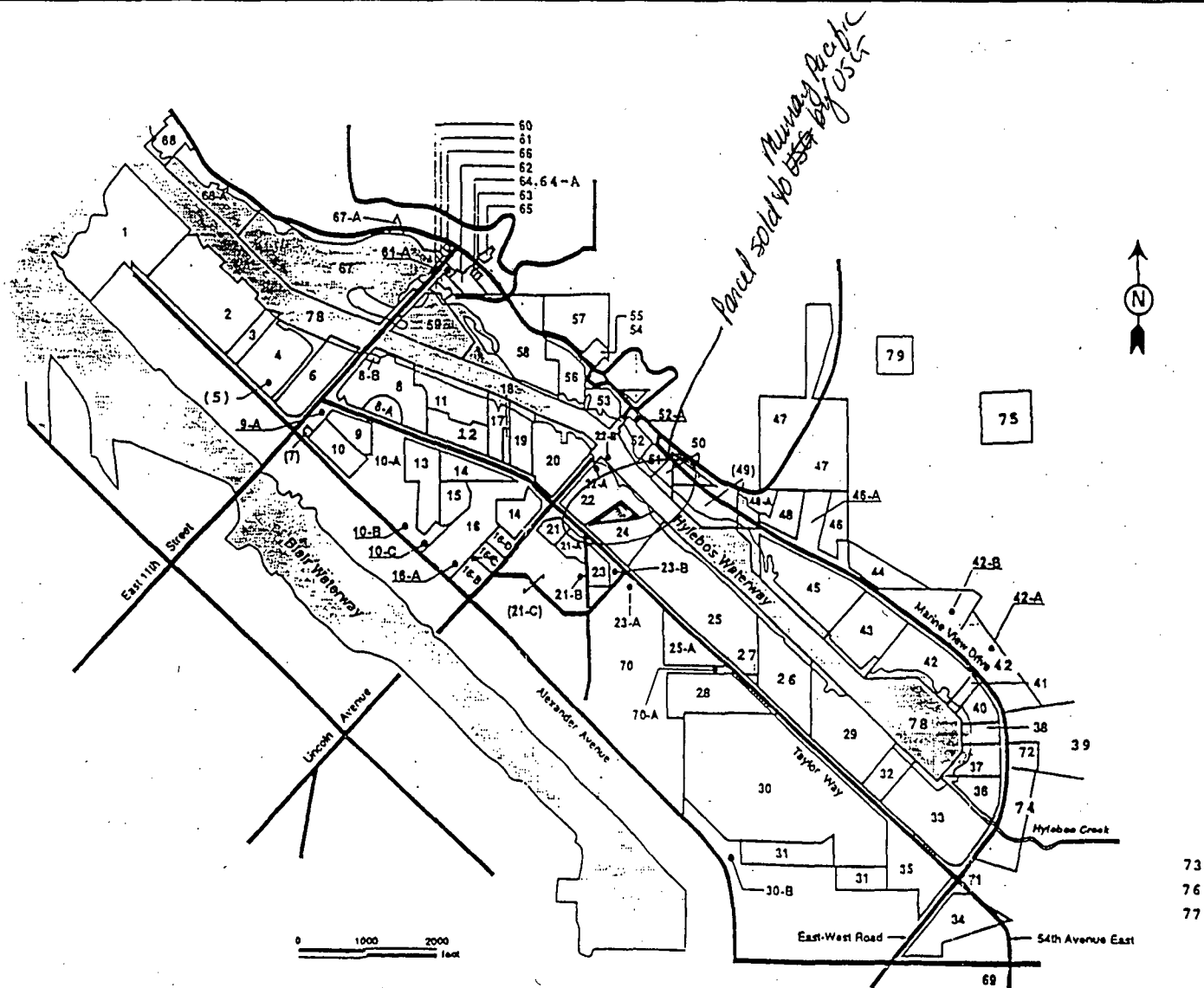


Figure C-1.

Current (as of 9/30/93) Hylebos Waterway facility locations (from PRC Environmental Management, Inc.).

CHRISTINE O. GREGOIRE  
Director



STATE OF WASHINGTON

## DEPARTMENT OF ECOLOGY

7272 Cleanwater Lane, LU-11 • Olympia, Washington 98504-6811 • (206) 753-2353

FAX STAMP

TO: Allison Hiltner EPA

PAGES + COVER

FROM: Byce Mercury

November 8, 1991

Camille Fjetland  
1621 Marine View Drive NE  
Tacoma, WA 98422-4198

Dear Ms. Fjetland:

As you requested, here are the results of the analyses of soil and sediment samples collected on your property on May 14, 1991. Lab sample number 208061 represents a composite of soil adjacent to the woodwaste-slag pile on the south side of your property.

Lab sample number 208062 represents a composite of sediments from a drainage area which flows to Hylebos Creek on the south side of your property. All results are total ppm, mg/kg, dry weight.

	# 208061	# 208062	MTCA - soil Method A	CB/NT Rod Sediment Quality Objectives
Total PCB	<0.06	<0.06	1.0	0.15
Arsenic	329	99.5	20	57
Copper	364	97.0	--	390
Lead	202	45.4	250	450
Zinc	542	128	--	410

Sincerely,

Mike Herold  
Commencement Bay Program  
Department of Ecology

MH:dc(11/tcp1)